

**Haney, et al. v. Range Resources - Appalachia, LLC, et al (Docket No. 2012-3534,
Washington County Court of Common Pleas) Mediation Settlement General
Terms**

Mediation was conducted on January 19, 2018, the following general terms were agreed upon by the parties, to resolve the disputes listed below. The parties further agree to draft, finalize and execute a mutually acceptable release and settlement agreement that is consistent with the terms below. The general terms of the release and settlement are outlined below:

1) Total Settlement Amount: \$3,000,000, broken down as follows:

Range Resources - Appalachia, LLC \$1,880,000

Red Oak Water Transfer NE, LLC [REDACTED]

New Dominion Construction, Inc. [REDACTED]

Terrafox Environmental Technology [REDACTED]

SKAP Industries, Inc. [REDACTED]

Engineered Synthetic Products, Inc. [REDACTED]

Microbac Laboratories, Inc. [REDACTED]

Multi-Chem Group, LLC [REDACTED]

Highland Environmental, LLC [REDACTED]

EAP Industries, Inc.

Solmax

2) Broad Release of ALL Claims Against Defendants:

Any and all claims for liability, actions, causes of actions, and damages arising out of or related to past, current, and/or future claims for past, current, and/or future activities related to Defendants' operations, products, services, and/or any and all related activities, including a release of future claims related to Defendants' operations and inconvenience or nuisance of future operations ("Released Claims").

The settlement and release includes consideration provided by Defendants for Plaintiffs' future claims, injuries, damages, and causes of action related to future operations at the Yeager Site and nearby sites. Plaintiffs enter into this settlement and release in recognition of and with full knowledge that Range intends to continue or expand natural gas operations at the Yeager Site and other nearby sites in the future.

Final settlement and release will include a mutual release.

3) Broad Covenant Not to Sue for any of the Released Claims, Indemnity for breach of Covenant Not to Sue with recovery of attorney fees; No assignment of claims

4) Plaintiffs agreement to Non-Disparagement of Defendants

5) Right of First Refusal for Range to purchase Voyles and Haney properties, except in the event that Stacey Haney wishes to sell 1049 McAdams

...of the Voyles wish to settle transfer into
the same Road to their children.

6) Medical Secondary Payer Act Release and Set Aside provision

7) Dismissal of All Actions, including but not limited to:

- Haney, et al. v. Range Resources – Appalachia, LLC, et al. (Washington County Court of Common Pleas); including any and all related appeals
- Voyles matter (Commonwealth Court)

8) Certification from Plaintiffs and Plaintiffs' Counsel of Compliance related to return or destruction of discovery

9) Settlement to be confidential at the option of each defendant.

Microbac by re
Solmax by Match
Red Oak Water Treatment

[Signature]

PLAINTIFFS

Beth R. Vagler

John D. ...

Honey Waples

Stacy L. Haney

Hungary

...

PBR, Inc. d/b/a SKAPS (and)
Engineered Synthetic Products, Inc. by
Industries, Inc. by Alan A. Miller

Appalachia, LLC
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